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December 30, 2011

Ms. Ingrid H. Hopkins
Water Protection Division (3WP42)
US EPA – Region III
1650 Arch Street
Philadelphia, PA 19103-3029
(215) 814-5437
hopkins.ingrid@epa.gov

**RE: Benning Road Generating Station – NPDES Permit No. DC 0000094
Metal Excursion – Outfall 013Q**

Dear Ms. Hopkins,

This letter is a follow-up to the December 29, 2011 telephone notification, made on behalf of Pepco Energy Services, Inc. by Ms. Heather Brinkerhoff, EHS Manager, to report daily maximum copper, iron and zinc excursions from a grab storm water sample taken on November 29, 2011 from Outfall 013.

On December 29, Ms. Brinkerhoff received the laboratory analysis indicating daily maximum concentrations for copper, iron and zinc were exceeded. Ms. Brinkerhoff made the required telephone notification per NPDES permit condition VI.6 to the USEPA.

Lab and field results indicated the following:

Analyte	Units	Permit Limit Daily Max	Results
Copper	ug/L	13.44	37.0
Iron	mg/L	1.0	17
Zinc	ug/L	117.18	260.0

Investigation of the metals excursions included a review of historical metal concentrations to obtain baseline storm water sample data. Specifically, storm water sample data gathered during the previous NPDES permit period for the Benning Road Generating Station indicates that the November 29, 2011 values are comparative to historical values, i.e. typical metal concentrations found in storm water samples dating back several years are similar to those seen in recent analysis.

On July 19, 2010, the facility submitted to EPA a TMDL Implementation Plan, as required by NPDES permit condition VII.E. The TMDL Plan provided information on past, current, and planned activities at the facility to meet the required load reductions for the Anacostia River TMDLs for metals. EPA

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approved the plan and the facility has begun the implementation process, including taking baseline storm water samples from various locations throughout the facility to locate potential hot spots and increased metal infiltration to storm water. These storm event results will then dictate which locations to use those best management practices listed in the plan to reduce the TMDL and consequently resolve any future metal excursions.

Please contact me at (703) 253-1787 or by electronic mail at mwilliams@pepcoenergy.com if you need additional information.

Respectfully yours,



Michael V. Williams
Power Plant Asset Manager
Pepco Energy Services, Inc.